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11 Attorneys for Timothy W. Gleason, Miriam
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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
PG&E Corporation,
and
PACIFIC GAS AND ELECTRIC
COMPANY,
Debtors.

Case No. 19-30088-DM

Chapter 11

**DECLARATION OF RICHARD
FRANKEL IN SUPPORT OF MOTION
PURSUANT TO FED. R. BANKR. P.
9006(b)(1) TO ENLARGE THE TIME TO
FILE PROOF OF CLAIM**

Date: August 23, 2022

Time: 10:00 a.m.

Court: Courtroom 17
450 Golden Gate Avenue
San Francisco, CA 94102

Judge: Hon. Dennis Montali

Objection deadline: August 16, 2022
4:00 p.m. (Pacific Time)

Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

*All papers shall be filed in the Lead Case,
No. 19-30088-DM

I, Richard Frankel, declare as follows:

1. I am an attorney at law duly licensed to practice before the courts of the State of Texas and numerous federal courts. I am a lawyer with Reiner, Slaughter, Mainzer & Frankel LLP, one of the counsel for Movants. I have personal knowledge of the facts stated in this declaration and, if sworn as a witness, could and would competently testify thereto.

2. I am over eighteen years of age, of sound mind, and fully competent to make this declaration. All statements in this declaration are based on my own personal knowledge and

1 observation and from my review of the court and business records in this case, or upon
2 information and belief when indicated. If called to testify on this matter, I can and will
3 competently testify to the matters set forth in this declaration.

4 3. My law firm represents wildfire victims who sustained losses from the Camp Fire
5 in 2018. My firm has timely filed over 800 proofs of claim with Prime Clerk for losses clients
6 suffered as a result of these fires.

7 4. Timothy W. Gleason, Miriam Gleason, and Luke Gleason (together, "Movants")
8 contacted my office on or about July 10, 2022.

9 5. The extended December 31, 2019 Claims Bar Date in the jointly administered
10 bankruptcy cases of PG&E Corporation and Pacific Gas and Electric Company has passed.

11 6. As soon as I became aware that no proof of claim was filed for Movants, my firm
12 began preparing Movants' proof of claim and sought assistance of local counsel to file this
13 Motion.

14 7. Movants owned and lived on residential real property commonly known as 4700
15 Zephyr Point Road, Paradise, California (the "Property"). The Property, including the residence
16 and surrounding vegetation, was severely damaged by the Camp Fire.

17 8. At the time of the Camp Fire, Timothy Gleason and Miriam Gleason lived on the
18 Property with their then-teenage son Luke Gleason. Movants suffered emotional distress from
19 fleeing the fire and being displaced from their home.

20 9. Movants delayed in timely filing a proof of claim because the extreme trauma of
21 the fire has made it nearly impossible for Movants to deal directly with the consequences of the
22 Camp Fire, including potential litigation.

23 10. The Fire Victim Trust has only completed determinations on approximately 60% of
24 all claims filed.

25 11. I am advised that the trustee is not going to oppose this Motion.

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 22nd day of July, 2022, in Houston, Texas.

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5 By: 
6 RICHARD FRANKEL
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